REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 9-15 are pending. Claims 9, 11 and 13 are independent and hereby amended. No new matter has been added. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II.   SUPPORT FOR AMENDMENT IN SPECIFICATION

Support for this amendment is provided throughout the Specification as originally filed and specifically at paragraphs [0032], [0036] and [0046] of Applicants' corresponding published application. By way of example and not limitation:

> [0032] The reproduction program 16 is a program for reproducing image data and the like picked up by the digital camera 15 or the like. The reproduction program reproduces image data and audio data by using, e.g., GUI (Graphical User Interface). The automatic activation program 17 executes the reproduction program 16 in response to a detection signal of PC 1 detecting that the terminal 11 of the memory device 10 is connected to the USB port 8. The data write program 18 is a program for writing image data picked up by the digital camera 15 in the memory device 10. **The driver 19 is a program for operating the memory device 10 on PC 1. The install program 20 is a program for installing the programs 16 to 19 in PC 1.**

[0036] If the driver 19 recorded in the recording medium 14 is not installed in PC 1 and a user connects the memory device 10 to the USB interface 6, CPU 2 instructs to install the driver 19 through plug-and-play as described above.

[0046] Further, according to the embodiment, for example, if a user wishes to reproduce and view image data and the like stored in the memory device 10 on a second PC (not shown) different from PC 1, the second PC can execute the following processing. For example, as a user connects the memory device 10 to a USB interface possessed by the second PC, the second PC searches a driver for operating the memory device 10 through plug-and-play. Since the second PC does not have the driver, it is recommended to install an optimum driver. The user operates the second PC to install the driver 19 stored in the memory device 10 and install the reproduction program 16 and automatic activation program 17 in the second PC. This installation can be performed by using the install program 20 stored in the memory device 10. Alternatively, if the second PC does not have the driver, it may access the memory device and automatically install an optimum driver (driver 19) by using the install program 20. Thereafter, by merely connecting again the memory device 10 to the USB Interface, the reproduction program can be automatically activated by the automatic activation program 17 and image data and the like can be reproduced.

III.   RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 9-11 and 13 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 2001/0041021 to Boyle (hereinafter, merely "Boyle") in view of U.S. Patent No. 5,633,678 to Parulski et al. (hereinafter, merely "Parulski").

Claim 12 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle and Parulski in view of Applecare Document: 122014.

Claim 14 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle and Parulski in view of US 2004/0004737 to Kahn (hereinafter, merely "Kahn").

Claims 15 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle in view of US 2003/0076365 to Sesek (hereinafter, merely "Sesek").

Claim 9 recites, *inter alia*:

…driver program data for operating the portable memory device
on the host machine; and

install program data for installing the reproduction program data,
the execution program data and the driver program data,

wherein **the install program data automatically installs the
driver program data on the host machine by connecting the
portable memory device to the host machine**… (Emphasis
added)

As understood by Applicants, Parulski relates to a digital electronic still camera of

the type that is used with a host computer.

Applicants submit that neither Boyle nor Parulski, taken alone or in combination,

that would disclose or render predictable the above-identified features of claim 9. Specifically,

neither of the references used as a basis for rejection discloses or renders predictable "**the install**

program data automatically installs the driver program data on the host machine by

connecting the portable memory device to the host machine," as recited in claim 9.

Specifically, the Office Action (page 3) asserts that Boyle describes that the sync

manager runs after the device is connected, and refers to Boyle, paragraphs [0010]. Thus, Boyle,

paragraphs [0010], [0023] and Fig.3 are reproduced as follow:

[0010] In a preferred embodiment, the conduit of the present
invention is a software program that is installed into the standard
"HotSync" manager of the PC, providing seamless synchronization
between the PDA and the PC without the need for user interaction.
Other advantages, features and embodiments of the present
invention will be apparent from the drawings and detailed
description as set forth below.

[0023] Referring now to FIG. 3, a block diagram of one
embodiment of the sync manager 230 of FIG. 2 is shown,

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according to the present invention. The sync manager 230 includes, but is not limited to, an imaging conduit 310, a mail conduit 312, a contacts conduit 314, a calendar conduit 316, and an expense conduit 318. Each conduit in the sync manager 230 controls the exchange of particular types of data between the computing device 110 and the handheld electronic device 120.
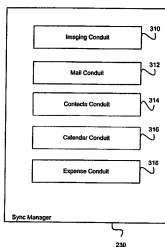

Fig. 3

Applicants submit that Boyle discloses the sync manager includes an imaging conduit, a mail conduit, a contacts conduit, a calendar conduit, and an expense conduit, but nothing has been found in Boyle that discloses the driver program can be installed automatically by connecting the portable memory device to the host machine, *i.e.*, through plug-and-play. Thus Boyle fails to disclose or render predictable **the install program data automatically installs the driver program data on the host machine by connecting the portable memory device to the host machine,** as recited in claim 9.

Furthermore, this deficiency of Boyle is not cured by the supplemental teaching of Parulski.

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Therefore, Applicants submit that independent claim 9 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 9, independent claims 11 and 13 are also patentable, and Applicants thus respectfully request reconsideration of the rejections thereto.

IV.   DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Applicants thereby respectfully request reconsideration and withdrawal of rejections thereto. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the

Examiner specifically indicate those portions of the reference, or references, providing the basis

for a contrary view.

   Please charge any additional fees that may be needed, and credit any

overpayment, to our Deposit Account No. 50-0320.

   In view of the foregoing amendments and remarks, it is believed that all of the

claims in this application are patentable and Applicants respectfully request early passage to

issue of the present application.

         Respectfully submitted,

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